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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
KPM ANALYTICS NORTH AMERICA
CORPORATION,
Plaintiff,
vs. C.A. No. 4:21-cv-10572-TSH
BLUE SUN SCIENTIFIC, LLC; THE INNOVATIVE
TECHNOLOGIES GROUP & CO., LTD; ARNOLD
EILERT; MICHELLE GAJEWSKI; ROBERT
GAJEWSKI; RACHAEL GLENISTER; GREGORY
ISRAELSON; IRVIN LUCAS, and PHILIP
OSSOWSKI,
Defendants.

-----x
Confidential, Attorneys' Eyes Only

30(b)(6) CORPORATE DESIGNEE

DEPOSITION

ERIC OLSON

CONDUCTED VIRTUALLY

Tuesday, April 26, 2022

10:11 a.m.

Laurie K. Langer, RPR

1 believe that ITG and Blue Sun are essentially one and
2 the same?

3 A. ITG provides the hardware for Blue Sun
4 Scientific. It provided support to them.

5 Q. Did you say "support"?

6 A. Yes.

7 Q. Other than providing support and hardware and
8 other than the ownership of the facility information
9 that you've already given me; is there any other basis
10 for KPM's contention that ITG and Blue Sun are
11 essentially the same company?

12 A. (No response.)

13 Q. I didn't hear your answer, Mr. Olson.

14 A. Not that I'm aware.

15 Q. Can you identify -- can KPM identify, sitting
16 here today, any machine that ITG has directly interfered
17 in the sale of by a customer or otherwise?

18 MR. GUTKOSKI: Objection to the form of the
19 question.

20 A. Can you restate the question too, please.

21 Q. Yes. Does KPM contend that ITG has taken any
22 action to interfere in the sale of a machine and if so
23 can KPM identify the machine either by customer or
24 otherwise?

1 Q. Does KPM contend that ITG took any activities to
2 interfere, directly interfere in the sale of any
3 SpectraStar machines?

4 MR. GUTKOSKI: Objection to the form of the
5 question.

6 A. With the connection that ITG and Blue Sun are an
7 almost singular entity.

8 Q. What do you mean by "with the connection that
9 they're almost a singular entity"?

10 A. KPM believes that ITG and Blue Sun are merely one
11 and the same.

12 Q. Why does KPM believe that?

13 A. Because ITG and Blue Sun are in the same
14 facility, the same structure, the same ownership, and
15 heavily connected to each other.

16 Q. Well, let me ask you. You mentioned the same
17 facility and the same ownership; do you know who the
18 ownership of ITG and Blue Sun are? Does KPM know that?

19 A. From our understanding and information ITG is
20 owned by Bob Wilt. Robert Wilt. And Blue Sun
21 Scientific I believe is owned by Robert Wilt and
22 Irvin Lucas.

23 Q. Other than the ownership that you mentioned and
24 the facility, what other, if any, evidence leaves KPM to